

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network :
Rationalization Service : Docket No. N2012-1
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORIES TO
THE UNITED STATES POSTAL SERVICE

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the
Greeting Card Association herewith submits interrogatories and requests for pro-
duction of documents; specifically:

Institutional interrogatories GCA/USPS-1 to -5

The term "documents" includes, without limitation, letters, telegrams,
memoranda, reports, studies, articles from periodicals, speeches, testimonies,
books, pamphlets, tabulations, and workpapers. In terms of format, "documents"
includes written or printed records and disks, tapes, or other recorded media (to-
gether with such written material as is necessary to understand and use such
disks, tapes, or other media).

December 16, 2011

Respectfully submitted,

GREETING CARD ASSOCIATION

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NOTE: Any part of these interrogatories may be redirected to a Postal Service witness, as necessary.

GCA/USPS-1

Please describe and explain fully the relationship, if any, between (i) the Mail Processing Network Rationalization plan and associated changes in service standards, as set forth in this Docket, and (ii) the plan to eliminate Saturday delivery, as set forth in Docket No. N2010-1. In particular:

(a) Do the Mail Processing Network Rationalization plan presented in this Docket (hereafter, "MPNR plan") and its associated service standard changes depend for their feasibility on elimination of Saturday delivery?

(b) Do the savings anticipated from the MPNR plan and its associated service standard changes depend on elimination of Saturday delivery?

(c) If the answer to (b) is other than an unqualified "no," please indicate whether retention of existing Saturday delivery arrangements would (i) make any such savings unavailable, or (ii) affect the amount of such savings.

(d) If the answer to (c)(ii) is other than an unqualified "no," please indicate the amount of such effect on savings, breaking down the answer as far as possible among the categories of savings anticipated from the MPNR plan and its associated service standard changes.

GCA/USPS-2

(a) Did the development of the MPNR plan assume the elimination of Saturday delivery?

(b) If the answer to (a) is other than an unqualified "no," please state whether any alternative mail processing network rationalization plan, not assuming elimination of Saturday delivery, was prepared.

(c) If any alternative plan of the type described in (b) was prepared, please (i) describe any such plan and provide any documents setting forth, explaining or evaluating it, and (ii) describe the reasons why such alternative plan was not adopted.

GCA/USPS-3

Did the Postal Service, in deciding on the timing of this filing, consider the possibility that the filing, plus any related media coverage, could adversely affect the willingness of customers to use the mails for purposes and at levels commonly found in the end-of-year holiday season? If any such consideration occurred, please describe it fully and provide any documents setting forth, explaining, or evaluation such consideration.

GCA/USPS-4

The Postal Service asserts that falling mail volumes in First-Class Mail (hereafter, "FCM") have forced it to eliminate excess/redundant mail processing capacity and related transportation expenses.

(a) Please confirm that a moving average of the past three recent years 2008 – 2010 is 84.6 billion pieces for FCM, and that that is essentially the same as the 84.7 billion pieces from 1988 -1990. If you do not confirm, please explain why.

(b) Please confirm that between 1988 and 1990, overnight delivery was a service standard for FCM, and provide the volume of FCM that was delivered overnight.

(c) Under current delivery standards, what is the percentage of FCM that is delivered overnight?

(d) Please explain fully, including the use of geographic overlays of the national mail processing network then (1988 -1990) and now (2008-2010), why the Postal Service believes it must eliminate the overnight delivery standard to deliver the *same* FCM volume that it could deliver overnight not many years ago?

GCA/USPS-5

Please describe and explain fully the relationship, if any, between (i) the MPNR plan and associated changes in service standards, as set forth in this Docket, and (ii) the plan to close or consolidate roughly 3,600 retail post offices. In particular:

(a) Do the MPNR plan presented in this Docket and its associated service standard changes depend for their feasibility on elimination/consolidation of the above-cited several thousand retail post offices?

(b) Do the savings anticipated from the MPNR plan and its associated service standard changes depend on elimination/consolidation of several thousand retail post offices?

(c) If the answer to (b) is other than an unqualified "no," please indicate whether retention of existing levels of retail post offices would (i) make any such savings unavailable, or (ii) affect the amount of such savings.

(d) If the answer to (c)(ii) is other than an unqualified "no," please indicate the amount of such effect on savings, breaking down the answer as far as possible

among the categories of savings anticipated from the MPNR plan and its associated service standard changes.